

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 20-mj-30487

vs.

Hon. PATRICIA T. MORRIS  
United States Magistrate Judge

KADEN GILBERT,

Defendant.

---

**STIPULATED PROTECTIVE ORDER FOR  
DISCOVERY MATERIALS**

---

For the reasons stated in the government's Motion for Protective Order, it is hereby ORDERED under Rule 16(d) of the Federal Rules of Criminal Procedure:

1. Any and all discovery material containing personal identifiers and/or medical records provided in this case by the Government to Defendant is to be used by Defendant and their counsel solely for the preparation of their defense. No disclosure of these materials is authorized except as necessary to the preparation of the defense in this case, and such determination of necessity is to be made by counsel for the Defendant, not by the Defendant herself. This limitation applies to the discovery described in paragraph three provided by the Government in this criminal action, including discovery provided after issuance of this Order.

2. Disclosure of discovery materials for purposes related to defense of

the criminal case is permitted to: (a) members of the defense team, consisting of counsel, co-counsel, paralegals, investigators, litigation support personnel, the Defendant, and secretarial staff; (b) experts or consultants retained to assist in preparation of the defense; (c) potential witnesses who are deemed necessary by the defense team in connection with this case; and (d) this Court.

3. Counsel for defendant shall not allow their client to copy or retain any documents that contain the personal identifying information and/or medical records that the government provides in discovery. This limitation does not apply to the defendant's own records.

4. That counsel for the defendant: (a) shall not allow their client, or any other potential witness, to copy or retain any documents that contain the personal identifying information and/or medical records provided in discovery by the government, absent further order by this Court; (b) will take all reasonable steps necessary to ensure that government discovery materials are not improperly disclosed or distributed; and (c) shall destroy or return the government discovery materials upon the conclusion of this matter.

SO ORDERED, this 11 day of March 2021.

s/ PATRICIA T. MORRIS  
Patricia T. Morris  
United States District Judge